

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 05-111-JJF
	:	
KATSIARYNA KABIARETS,	:	
	:	
Defendant.	:	

**MOTION FOR CONTINUANCE OF TRIAL AND SCHEDULING OF
STATUS CONFERENCE**

Defendant, Katsiaryna Kabiarets, by and through her undersigned counsel, Eleni Kousoulis, hereby moves the Court for an Order continuing the Trial in this case, and setting a date for a Status Conference. In support of the motion, Ms. Kabiarets submits as follows:

1. Ms. Kabiarets is scheduled for trial on July 10, 2007, at 9:30 a.m.
2. Defense counsel, Eleni Kousoulis, was assigned this case on June 6, 2007. Ms. Kousoulis took over the case from attorney Christopher Koyste, following Mr. Koyste's resignation from the Federal Public Defender's Office on June 1, 2007.
3. Ms. Kousoulis has not yet had the opportunity to review the file in this case, or to meet with Ms. Kabiarets to discuss the case with her.
4. Due to the reassignment, Ms. Kousoulis requires additional time to meet with Ms. Kabiarets and to familiarize herself with the case.

5. Accordingly, Ms. Kabiarets believes, in the interests of justice, a continuance of the trial date in this case is warranted. Ms. Kabiarets respectfully requests that the trial in this case be continued and that a Status Conference be held in its place on July 10, 2007 at 9:30 a.m.

6. AUSA Douglas McCann, the attorney handling this case for the government, concurs in the defense's request to change the trial date, currently scheduled for July 10, 2007, to a Status Conference date.

WHEREFORE, Ms. Kabiarets respectfully requests that the Court continue the Trial in this matter and hold a Status Conference in its place on July 10, 2007 at 9:30 a.m.

Respectfully Submitted,

/s/

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DATED: June 25, 2007